

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	
GOODMAN NETWORKS, INC.,	§	Case No. 22-31641-mvl7
	§	(Chapter 7)
Debtor.	§	
<hr/>		
SCOTT M. SEIDEL, TRUSTEE, <i>et al.</i> ,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adv. No. 23-03090-mvl
	§	
HUDSON CLEAN ENERGY	§	
ENTERPRISES, LLC, <i>et al.</i> ,	§	
	§	
Defendants.	§	

AGREED MOTION TO CONTINUE TRIAL DOCKET CALL

TO THE HONORABLE MICHELLE V. LARSON,
UNITED STATES BANKRUPTCY JUDGE:

NOW COME plaintiff Scott M. Seidel, chapter 7 trustee for Goodman Networks, Inc., and defendants Hudson Clean Energy Enterprises, LLC, Alliance Texas Holdings, LLC, Neil Z. Auerbach, Judith Auerbach, Auerbach Partners, L.P., James Goodman, James Frinzi, Goodman Investment Holdings, LLC, Genesis Networks, Inc., Genesis Networks Global Services, LLC, Auerbach Children's Dynasty Trust U/A/D October 9, 2012, and Auerbach Family Dynasty Trust U/A/D October 9, 2012, and filed this *Agreed Motion to Continue Trial Docket Call*, in support of which they would respectfully show as follows:

The Trustee filed his *Original Compliant* on November 7, 2023. Certain of the defendants filed a motion to dismiss on February 20, 2024, which the Court denied following a hearing on March 26, 2024, by written order entered March 29, 2024. Those defendants have not yet

answered the complaint. However, under the Court's *Order Regarding Adversary Proceedings Trial Setting and Alternative Scheduling Order* (Dkt. No. 4), trial docket call is set for April 2, 2024. Under the circumstances, the parties file this motion to request a continuance of trial docket call to allow them time to negotiate a new scheduling order.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully request that the Court enter an order continuing trial a docket call pending submission of a revised scheduling order.

RESPECTFULLY SUBMITTED this 1st day of April 2024.

/s/ Julian P. Vasek

Julian P. Vasek
Tex. Bar No. 24070790
Munsch Hard Kopf & Harr P.C.
500 N. Akard St., Ste. 4000
Dallas, TX 75201
214-855-7528
jvasek@munsch.com

COUNSEL FOR THE TRUSTEE

/s/ Jason M. Rudd

Jason M. Rudd
Tex. State Bar No. 24028786
jason.rudd@wickphillips.com
Paul T. Elkins
Tex. State Bar No. 24092383
paul.elkins@wickphillips.com
3131 McKinney Ave #500
Dallas, TX 75204
(214) 692-6200

COUNSEL FOR DEFENDANT JAMES
FRINZI

/s/ Michael Cancienne

JORDAN, LYNCH & CANCIENNE PLLC
Michael Cancienne (SBN 24055256)
Joseph W. Golinkin II (SBN 24087596)
1980 Post Oak Blvd., Ste. 2300
Houston, Texas 77056
Telephone: 713.955.4028
mcancienne@jlcfirm.com

COUNSEL FOR THE AUERBACH
DEFENDANTS

/s/ Randall A. Pulman

Randall A. Pulman
Pulman, Cappuccio & Pullen, LLP
2161 NW Military Highway, Ste. 400
San Antonio, TX 78213
(210) 222-9494
Fax : (210) 892-1610
Email: rpulman@pulmanlaw.com

COUNSEL FOR THE GOODMAN
DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on April 1, 2024, a true and correct copy of this document (along with any attachments) was served via the Court's CM/ECF system on all parties entitled to such notice.

By: /s/ Julian P. Vasek

Julian P. Vasek

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	
GOODMAN NETWORKS, INC.,	§	Case No. 22-31641-mvl7
	§	(Chapter 7)
Debtor.	§	
<hr/>		
	§	
SCOTT M. SEIDEL, TRUSTEE, <i>et al.</i> ,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adv. No. 23-03090-mvl
	§	
HUDSON CLEAN ENERGY	§	
ENTERPRISES, LLC, <i>et al.</i> ,	§	
	§	
Defendants.	§	

AGREED ORDER GRANTING MOTION TO CONTINUE TRIAL DOCKET CALL

Before the Court is the *Agreed Motion to Continue Trial Docket Call* (the “Motion”), filed by plaintiff Scott M. Seidel, chapter 7 trustee for Goodman Networks, Inc., and defendants Hudson Clean Energy Enterprises, LLC, Alliance Texas Holdings, LLC, Neil Z. Auerbach, Judith Auerbach, Auerbach Partners, L.P., James Goodman, James Frinzi, Goodman Investment

Holdings, LLC, Genesis Networks, Inc., Genesis Networks Global Services, LLC, Auerbach Children's Dynasty Trust U/A/D October 9, 2012, and Auerbach Family Dynasty Trust U/A/D October 9, 2012. Having considered the relief requested in the Motion and the agreement of the parties, it is hereby:

ORDERED that the Motion is GRANTED, and trial docket call (currently set for April 2, 2024) is continued pending further order of the Court.

End of Order

Agreed:

/s/ Julian P. Vasek

Julian P. Vasek
Tex. Bar No. 24070790
Munsch Hard Kopf & Harr P.C.
500 N. Akard St., Ste. 4000
Dallas, TX 75201
214-855-7528
jvasek@munsch.com

COUNSEL FOR THE TRUSTEE

/s/ Jason M. Rudd

Jason M. Rudd
Tex. State Bar No. 24028786
jason.rudd@wickphillips.com
Paul T. Elkins
Tex. State Bar No. 24092383
paul.elkins@wickphillips.com
3131 McKinney Ave #500
Dallas, TX 75204
(214) 692-6200

COUNSEL FOR DEFENDANT JAMES
FRINZI

/s/ Michael Cancienne

JORDAN, LYNCH & CANCIENNE PLLC
Michael Cancienne (SBN 24055256)
Joseph W. Golinkin II (SBN 24087596)
1980 Post Oak Blvd., Ste. 2300
Houston, Texas 77056
Telephone: 713.955.4028
mcancienne@jlcfirm.com

COUNSEL FOR THE AUERBACH
DEFENDANTS

/s/ Randall A. Pulman

Randall A. Pulman
Pulman, Cappuccio & Pullen, LLP
2161 NW Military Highway, Ste. 400
San Antonio, TX 78213
(210) 222-9494
Fax : (210) 892-1610
Email: rpulman@pulmanlaw.com

COUNSEL FOR THE GOODMAN
DEFENDANTS